

# **HAZARDS & RULES**

## **Base Materials - Hazards and Impacts**

Water, in and of itself, is clean and non hazardous.

## **Additives and Contaminants - Hazards and Impacts**

When water is contaminated with materials such as oil, antifreeze or other automotive fluids, it may contain high levels of total petroleum hydrocarbons and other contaminants. This wastewater may need to be treated in order to meet the pollutant limits of your local publicly owned treatment works (POTW). In some instances, the wastewater may even need to be managed as a hazardous waste.

## **Regulatory Overview**

The Clean Water Act regulates the discharge of industrial wastewater and does not allow discharges of industrial wastewater to septic systems. Discharges to the waters of Indiana (including storm drains, rivers, streams, lakes, ditches, etc.) are only allowed if the business has a National Pollutant Discharge Elimination System (NPDES) permit from IDEM's Office of Water Management (OWM.) As mentioned in Chapter 1, this manual does not cover NPDES permitting requirements, as these permits are complex and are not recommended for small businesses. Contact CTAP or OWM if you are interested in obtaining more information on NPDES permitting.

If your shop discharges its wastewater to the sanitary sewer, you must meet the standards (effluent limits) set by the receiving POTW. In order to meet these standards, some shops may need to treat their wastewater prior to discharging it to the sewer. You should contact your local POTW to determine the type and amount of pollutants that you may discharge to the sewer.

Depending upon the type and level of contaminants in your shop's wastewater, the wastewater may be considered to be a hazardous waste. When hazardous waste enters the sanitary sewer, it is no longer regulated as hazardous waste, but rather, is regulated by IDEM's Office of Water Management and the publicly owned treatment works (POTW) that receives the wastewater.

Shops with holding tanks are required to have a construction permit and to make a hazardous waste determination on their wastewater (note that, because wastewater from holding tanks does not enter the sanitary sewer, the wastewater remains regulated under the hazardous waste rules.)

Wastewater that meets the POTW's standards may be hauled directly to the POTW. If the wastewater does not meet the POTW's standards, but does meet the standards of another permitted wastewater treatment facility, the wastewater may be hauled to that facility.

How you manage your shop's wastewater will depend upon the location where your bay drains discharge. If you do not know where your drains discharge, begin by doing the following:

- Check your sewer bill to determine if you are charged for services by your local POTW. If you are charged for this service, your shop is most likely connected to the POTW.
- Walk the property line to look for outfall pipes.
- Talk with neighbors to determine if outfall pipes originate from their property.
- Check with your county sanitation department to determine if they will add a colored dye to your wastewater to locate your discharge (sewer and excavating companies also perform this service.)
- Call the Indiana Underground Plant Protection Service (Call Before You Dig) at 800/382-5544. This service is available 24 hours a day, 365 days a year.

Note that older shops may have unauthorized connections to storm sewers because sanitary sewers may not have been available when the shop was built. In many areas, storm drains became available prior to sanitary sewers, and, as a result, industries connected to storm sewers.

Listed below are the management responsibilities that you must follow depending upon where your shop's bay drain discharges. Also listed are suggested practices that you should follow in order to ease your regulatory requirements or to avoid wastewater requirements altogether.

### **If You Discharge to a Septic System or Directly to the Environment:**

#### **You Must:**

- if your drain leads to a storm drain, river, stream, lake or to the ground, you must obtain an NPDES permit from OWM. The requirements for NPDES permitting are complex and are not well suited for the majority of small businesses. More suitable options include temporarily plugging your drains to become a "dry" shop, connecting to the local POTW, or installing a holding tank. Call CTAP for assistance.
- if your drain leads to a septic system, you must connect to the sanitary sewer or install a holding tank.
- if your shop does not have an oil/water separator, you must have one installed, and it must meet the design requirements of the Indiana Department of Fire & Building Services. Contact the Plan Review Division for specific design requirements. [Fire & Building Services] Prior to installing your oil/water separator, you must submit plans, specifications, and a construction permit application to OWM. An application can be obtained by contacting OWM at (317) 232-8645.

#### **You Should:**

- install wastewater containment sumps or holding tanks and have your wastewater hauled to a permitted wastewater treatment facility or connect your drains to a municipal sanitary sewage system
- follow the "you should" recommendations that reflect your new discharge status (either to the Sanitary Sewer or Holding Tank)
- follow the "you should" recommendations for all shops

### **If You Discharge to a Sanitary Sewer or POTW:**

your wastewater) and to notify them that you are discharging to their system. You must also meet all effluent limits set by the POTW. You may obtain a copy of the local sewer use ordinance (i.e., discharge rules) from your local municipal or district POTW. A listing of prohibited discharges and of Indiana's 45 approved POTW wastewater treatment programs can be obtained from IDEM's web site. If you discharge a substance into the sanitary sewer, which, if otherwise disposed, would be hazardous waste, you may need to submit a one-time notification to your local POTW and IDEM's Office of Land Management. Contact CTAP, IDEM's Office of Water Management, or your local POTW for more information. Note that your hazardous waste may not meet the effluent limits of your local POTW.

- if your shop does not have an oil/water separator, you must have one installed, and it must meet the design requirements of the Indiana Department of Fire & Building Services. Contact the Plan Review Division for specific design requirements. [Fire & Building Services] Prior to installing your oil/water separator, you must submit plans, specifications, and a construction permit application to OWM. An application can be obtained by contacting OWM at (317) 232-8645.
- schedule regular preventive maintenance to keep your oil/water separator operating at peak efficiency. [Fire & Building Services]
- ensure that your floors drain to approved oil-water separators or traps discharging to the sewer in accordance with the Plumbing Code. [Fire & Building Services]
- have the contents of oil separators or traps collected at sufficiently frequent intervals and removed from the premises to prevent oil from being carried into the sewers. Self-closing metal cans must be used for all oily waste. [Fire & Building Services]
- if your shop does not meet the POTW's effluent limits, you must:
  - change your work practices (i.e., preventing materials from entering your bay drains) so that your effluent meets the POTW's limits; or
  - install pretreatment equipment and schedule regular preventive maintenance to keep the equipment operating at peak efficiency so that your effluent meets the POTW's limits.

#### **You Should:**

- follow the "you should" recommendations for all shops that are listed below

#### **If You Discharge to a Holding Tank:**

##### **You Must:**

- if your drain leads to a holding tank, you must obtain a construction permit from OWM for the installation of the tank and have permission to haul your wastewater to the POTW. Your hauler will usually take responsibility for working with the POTW to ensure that they will accept your wastewater.
- have an oil/water separator that meets the design requirements of the Indiana Department of Fire & Building Services. Contact the Plan Review Division for specific design requirements. [Fire & Building Services] Prior to installing your oil/water separator, you must submit plans, specifications, and a construction permit application to OWM. An application can be obtained by contacting OWM at (317) 232-8645.
- if your non-hazardous wastewater does not meet the POTW's effluent limits, you must have

to: special treatment and storage requirements depending on the flash point of the material stored in the tank; secondary containment; and daily and/or weekly monitoring of the tank and its contents. Contact CTAP or IDEM's Office of Land Quality for assistance.

- properly manage your wastewater (refer to Chapter 3 for information on the proper handling of hazardous wastes.)
- count your wastewater toward your hazardous waste generator status (see Section 2.6.) Note that, when hazardous waste enters the sanitary sewer, it is no longer regulated as hazardous waste, but rather, is regulated by IDEM's Office of Water Management and the publicly owned treatment works (POTW) that receives the wastewater. Because wastewater from your holding tank does not enter the sanitary sewer, the wastewater continues to be regulated as a hazardous waste.

**You Should:**

- avoid generating wastewater, especially hazardous wastewater, by following the "You Should" and "You Should Consider" recommendations for all shops that are listed below.
- if your wastewater is nonhazardous, you should ask your hauler for written confirmation that the POTW accepted your shop's wastewater. Note that POTWs do not accept hauled wastewater that is a hazardous waste.

**For All Shops:**

**You Should:**

- post signs at sinks and paint stencils at drains to remind employees not to pour wastes into floor drains, sinks, outdoor storm drains or other sewer connections.
- review material safety data sheets for all products used at your shop and replace products that contain chlorinated and/or toxic solvents with more environmentally friendly, aqueous-based products.
- store used automotive fluids in leak-tight containers for recycling or disposal.
- use spill trays when draining automotive fluids or when adding fluids to a vehicle.
- use dry procedures such as sweeping shop floors rather than hosing them down with water.
- install secondary containment barriers around storage areas containing liquid materials.
- ensure that spill prevention and containment equipment, and cleanup supplies readily accessible to employees.

- oil/water separator.
- installing a temporary plug in your bay drains and becoming a “dry shop.”

## BACKGROUND ON OPTIONS TO CONSIDER

You may become a “dry shop” by eliminating water from your cleanup process and by preventing leaks and spills. By becoming a “dry shop,” you eliminate the need to monitor your wastewater and, potentially, to install expensive wastewater pretreatment equipment.

In order to become a “dry shop,” you should:

- identify and control all wastewater discharged from your facility by ensuring that employees do not pour liquid wastes into floor drains, sinks, outdoor storm inlets, or other sewer connections. Post signs at sinks and paint stencils at drains to remind employees. Seal your drains, using a temporary drain cover or an inflatable plug.
- prevent leaks from vehicles and equipment by:
  - placing designated drip pans under leaking vehicles while they are awaiting repairs. Make the repairs as soon as possible. You should:
    - keep a portable inflatable berm and absorbent material on hand.
    - drain all fluids, including air conditioner coolant, from wrecked vehicles upon arrival.
    - maintain your shop floor equipment. Check your equipment for leaks frequently.
- prevent drips and spills when working on vehicles by:
  - draining and replacing motor oil, coolant, and other fluids in a designated area where there are no connections to the storm drain or the municipal sewer. Clean up spills before they reach a drain.
  - emptying and wiping the designated drip pans when you are finished working on the vehicle, or when they are about half full, to avoid spills.
  - keeping a designated drip pan under the car while you unclip hoses, unscrew filters or remove other parts. Use larger, flat, low-brimmed pans under cars where mechanics are working and where ordinary drip pans are too cumbersome.
  - immediately transfer used fluids to their proper container. Don't leave drip pans or other open containers unattended.
- promptly clean up drips and spills:
  - For small spills:
    - scoop up the spilled material using a dust pan and squeegee, when possible (such as with spilled oil). If not thick enough to scoop, clean spills with a rag or absorbent. Do not wash spilled materials down the drain.
    - use a damp mop for routine cleanup, and wet mop the floor only in the areas that need it.
  - For medium spills:
    - use absorbent “snakes” as temporary booms to contain a liquid while you clean it up.
    - use dry absorbent material such as “kitty litter” or “floor dry” to soak up the liquids.
    - perform a hazardous waste determination on absorbent materials prior to disposal.
    - use a wet/dry shop vacuum cleaner to collect spills for storage in segregated waste

- For larger spins or for more information on spin management requirements, refer to Section 3.7.

**Do not pour wastes down this drain  
or any other drain.**